

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

DIANE T. CLARKE, ILANA KOPMAR,
ISAAC ALTMAN, and DAVID ROSENFELD,

Plaintiffs,

-against-

THE ASSOCIATION OF LEGAL AID
ATTORNEYS, AMALGAMATED LOCAL
UNION 2325 OF THE INTERNATIONAL
UNION, UNITED AUTOMOBILE
AEROSPACE AND AGRICULTURAL
IMPLEMENT WORKERS OF AMERICA
(UAW), AFL-CIO, LISA OHTA, BRET J.
TAYLOR, JEREMY BUNYANER, EMILY C.
EATON, MARTYNA KAZNOWSKI,
GILLIAN R. KRESS, JOANA CALIN, PUJA
PAUL,

Defendants.

Index No. 2:23-cv-08869 (NJC)(ARL)

[PROPOSED] PRELIMINARY INJUNCTION ORDER

THIS MATTER comes before the Court upon the application of Plaintiffs Diane T. Clarke, Ilana Kopmar, Isaac Altman, and David Rosenfeld (collectively, “Plaintiffs”) for entry of a Preliminary Injunction (the “Application”) against the Association of Legal Aid Attorneys, Amalgamated Local Union 2325 of the International Union, United Automobile Aerospace and Agricultural Implement Workers Of America (UAW), AFL-CIO (“ALAA”), Lisa Ohta, Bret J. Taylor, Jeremy Bunyaner, Emily C. Eaton, Martyna Kaznowski, Gillian R. Kress, Joana Calin, and Puja Paul (collectively, “Defendants”) enjoining Defendants and their affiliates, officers, agents, servants, employees, attorneys, confederates, and all persons acting for, with, by, through, under or in active concert with Defendants from conducting a vote on, adopting, or issuing the “Resolution Calling for a Ceasefire in Gaza, an End to the Israeli Occupation of

Palestine, and Support for Workers' Political Speech" (the "Resolution") or any substantially similar resolution on behalf of the ALAA members. Having reviewed the papers in support of the Application, the submissions in connection with Defendants' Motion to Dissolve the TRO, the submissions and proceedings, including the transcript of the November 21, 2023 hearing before Judge Felice J. Muraca, Supreme Court of New York, Nassau County, prior to the removal of this action, the Court finds that Plaintiffs meet the criteria for entry of preliminary injunctive relief.

THIS COURT having determined that the evidence submitted in support of the Application establishes that Plaintiffs have a likelihood of success on the merits; that no remedy at law exists; and that Plaintiffs will suffer irreparable harm, if the injunction is not granted; and

THIS COURT having determined, therefore, that issuing this Preliminary Injunction is warranted under Federal Rule of Civil Procedure 65;

NOW THEREFORE, this Court **ORDERS** that Defendants and their affiliates, officers, agents, servants, employees, attorneys, confederates, and all persons acting for, with, by, through, under or in active concert with Defendants be temporarily enjoined and restrained from conducting a vote on, adopting, or issuing the Resolution or any substantially similar resolution on behalf of the ALAA members until further order of this Court.

Dated: Central Islip, New York
December __, 2023

NUSRAT J. CHOUDHURY
United States District Judge